

1:23-mj-3031-TMP

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Michael LaLonde Jr, Border Patrol Agent, currently assigned to the Cartel, Gang, Narcotics and Laundering Task Force (hereinafter referred to as CGNL) as a Task Force Agent (hereinafter referred to as TFA) with the Federal Bureau of Investigation (hereinafter referred to as FBI), hereinafter referred to as Affiant, being duly sworn, do depose and state that:

1. As a Task Force Agent, of the FBI, your Affiant is an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7). Your Affiant is empowered to conduct investigations and to make arrests for federal felony offenses.

2. Your Affiant has been employed by the United States Border Patrol since August 2, 2010. Your Affiant is currently assigned to CGNL, a Cleveland based, multi-agency, federal, state, and local law enforcement drug task force. Your Affiant has participated in investigations targeting organizations involved in drug trafficking offenses in the Northern District of Ohio and elsewhere. Your Affiant has participated in narcotics/drug enforcement and the dismantlement of mid to upper-level drug trafficking organizations. Your Affiant has assisted in planning and executed long-term investigative operations which have led to the disruption and dismantlement of criminal street gangs whose revenues centered primarily on the trafficking and distribution of illicit drugs.

3. As a United States Border Patrol Agent, your Affiant received basic drug training while at the Federal Law Enforcement Training Center in Artesia, New Mexico. After graduating the Border Patrol Academy, Your Affiant received three months of field training by Field Training Officers in Mcallen, Texas and an addition three months of training by Field Training Officers in Kingsville, Texas at the Sarita Checkpoint. During this time, your Affiant participated in routine Border Patrol functions, including but not limited to investigating drug related

offenses. Your Affiant was assigned to CGNL in August 2021. Your Affiant received basic narcotic investigation training by Task Force Officer's (TFO) assigned to CGNL, in which basic and advanced drug-related investigation techniques were conducted, including, but not limited to: surveillance, undercover operations, interview and interrogation techniques, informant recruitment and control, search warrant and case preparation. Your Affiant receives annual training by the United States Border Patrol regarding law enforcement matters, including matters relating to drug trafficking. Your Affiant has participated in all of the usual methods of investigation including, but not limited to: visual surveillance, questioning witnesses, and analyzing evidence. Your Affiant has been involved in drug-related arrests. Your Affiant has planned and executed search warrants resulting in the seizure of drugs, their proceeds, weapons, and drug preparation tools. These investigative operations have included undercover operations and Title III intercepts of telephone communications and activities. Your Affiant makes this affidavit in support of a criminal complaint and arrest warrant for Nefer OJEDA-ELENES, for the offense(s) of conspiracy to distribute and possess with the intent to distribute controlled substances (cocaine and fentanyl), in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

4. Your Affiant is familiar with the facts and circumstances of the offenses described in this affidavit based upon your Affiant's personal participation in the investigation of Nefer OJEDA-ELENES, as well as through information obtained from other law enforcement agencies, witnesses, and reliable sources.

5. Except as otherwise noted, the information set forth in this affidavit has been provided to your Affiant by FBI Agents or other law enforcement officers. Unless otherwise noted, whenever in this affidavit your Affiant asserts that a statement was made, the information was

provided by another law enforcement officer (who may have had either direct or hearsay knowledge of the statement) to whom your Affiant has spoken or whose report your Affiant has read and reviewed. Likewise, information resulting from surveillance, except where otherwise indicated, does not necessarily set forth your Affiant's observations but rather has been provided directly or indirectly by FBI Agents or other law enforcement officers who conducted such surveillance. Likewise, any information pertaining to vehicles and/or registrations, personal data on subjects and record checks has been obtained through the Law Enforcement Automated Data System (LEADS); from Thompson Reuters, a law enforcement credit header database (CLEAR); from the State of Ohio or the National Crime Information Center (NCIC) computers; or by the Ohio Law Enforcement Gateway database (OHLEG) by members herein described.

6. Since this affidavit is being submitted for the limited purpose of securing the requested arrest warrant, this affidavit does not contain each and every piece of information known to your Affiant and other investigators, but rather only information sufficient to establish probable cause to support the requested arrest warrant.

7. The Cleveland FBI's CGNL Task Force, IRS investigators, and Central Valley HIDTA investigators have been investigating the drug trafficking activities of Nefer OJEDA-ELENES (hereinafter referred to as "OJEDA-ELENES"), Ronald RENDON (hereinafter referred to as "RENDON"), Roman HERNANDEZ, Carlos LOPEZ (and or LOPEZ) and other known associates affiliated with this Drug Trafficking Organization (DTO) regarding violations of the Target Offenses listed above, since August 2021. In early June 2022, CGNL investigators were contacted by investigators with Central Valley HIDTA Task Force, wherein, investigators stated they learned through GPS tracking data of vehicles and precise data location of cellular telephones, that OJEDA-ELENES, Carlos LOPEZ and others, frequent the Cleveland, Ohio area. Based on

their investigation, it was believed that OJEDA-ELENES, Carlos LOPEZ and others, were likely in the Cleveland, Ohio area for the purpose of furthering their DTO and conducting drug trafficking activity. Central Valley HIDTA investigators stated they believed, based on their investigation, that OJEDA-ELENES is the owner of “Racoon Transportation LLC.” Investigators stated the company owned approximately three tractor trailers. Investigators further stated they believed OJEDA-ELENES, Carlos LOPEZ and others, were utilizing the tractor trailers to transport a substantial amount of fentanyl, cocaine, and methamphetamine from California to the Midwest, including the Northern District of Ohio, and the east coast. After receiving this information from Central Valley HIDTA, CGNL investigators initiated an investigation into OJEDA-ELENES’ DTO. During the investigation, investigators were able to identify RENDON and Roman HERNANDEZ as close associates of OJEDA-ELENES’.

FACTS AND CIRCUMSTANCES ESTABLISHING PROBABLE CAUSE

8. Sometime between March 29, 2022, and April 5, 2022, investigators coordinated for an undercover officer (UC) to conduct a controlled purchase of narcotics in the city of Moreno Valley. During the operation, the subject, driving a Honda, indicated that they would provide an additional 15 pounds of methamphetamine to the UC. Investigators observed the Honda pull into a gas station and meet up with a gray/silver Nissan Versa California license plate 7XRxxxx (hereinafter the Nissan). Once the Honda and Nissan met up, they both drove out of the parking lot in tandem. Investigators conducted mobile surveillance on the Honda and Nissan as they traveled to an empty and desolated area at 21857-21877 Elmwood St Perris, CA 92570. This location was a large parking lot for semi-trucks to park. There were no other vehicles at this location and the Honda and Nissan parked next to one another. Investigators observed the occupants of the Honda and Nissan make contact with one another and it appeared as though

something was handed off from the Nissan to the Honda, but it was unclear as to what exactly because the lighting was dark. The Honda and Nissan stayed at that location for a few minutes before both vehicles departed. The subject called and said that they were on their way with the methamphetamine. This leads Investigators to believe that the Nissan delivered the additional methamphetamine to the Honda during this meet. A DMV records check on the Nissan revealed that the registered owner was Carlos Francisco LOPEZ (hereinafter LOPEZ) with a listed address of xxxxx Valley Meadows Dr Moreno Valley, CA 92553. Investigators conducted a DMV driver's license records check on LOPEZ and located a photograph of him. The driver's license did not have a listed address for LOPEZ. Approximately twenty (20) minutes later, the subject arrived in the Honda and handed the UC fifteen (15) pounds of methamphetamine.

9. Sometime between April 16, 2022, and April 21, 2022, Investigators conducted surveillance at xxxx Mariposa Ave Riverside, CA 92503. During DMV vehicle registration records checks on LOPEZ' vehicles, Investigators located the address of xxxx Mariposa Ave as a possible residence for him. Once at this location, Investigators observed the Nissan parked on the street in front of xxxx Mariposa Ave. Investigators surveilled the Nissan as it traveled to xxxxx Anacapa Rd Victorville, CA 92392 and investigators observed LOPEZ exiting the vehicle and walking towards the front door of the residence.

10. On April 21, 2022, Investigators wrote and obtained a signed search warrant to deploy GPS tracker devices on the Honda and Nissan. Investigators deployed the trackers on both vehicles and monitored both trackers daily.

11. On May 18, 2022, Detectives conducted surveillance at xxxx Miraposa Ave. Investigators observed LOPEZ walk out of the side gate of the residence and enter the Nissan. Detectives conducted mobile surveillance on the Nissan as it traveled to xxxxx S Archibald Ave.

As LOPEZ arrived at the location, he stopped near a white colored Jaguar (California license plate 8VXxxxx-herinafter Jaguar). Detectives conducted DMV records check on the Jaguar and revealed the registered owner was Nefer OJEDA with a listed address of xxx N College Dr Apt, K18 Upland, CA 91786. Investigators drove by and observed LOPEZ speaking to Nefer OJEDA (herein after OJEDA) who exited the Jaguar. LOPEZ and OJEDA spoke for approximately 10-15 minutes before OJEDA departed in the Jaguar. LOPEZ got back into his Nissan and drove onto the parking lot of xxxxx S Archibald Ave.

12. Detectives observed the Nissan drive into the parking lot and park. Detective Dan Holden observed LOPEZ exit his Nissan and walk up to two parked Freight Semi Trucks and access both by key. Both Semi Trucks were parked next to one another. Det. Holden observed the Semi Trucks California license plates to be YP14523 (hereinafter 2019 Semi Truck) and XP67282 (hereinafter 2017 Semi Truck). Detectives conducted DMV records checks on both license plates and they came back to "Raccoon Transportation." Det. Holden then observed LOPEZ get into the driver's seat of the 2019 Semi Truck and drove away out of the parking lot.

13. A few minutes later, a blue colored 2016 Mazda (California license plate 8LAxxxx- herein after Mazda) arrived at the location and parked right next to the 2017 Semi Truck. Investigators observed an unknown individual driving the Mazda. Investigators observed two males (later identified as Benny DE LOERA and Ruben LUNA (herein after DE LOERA and LUNA) exit the Mazda. LUNA unloaded a large plastic bin from the trunk of the Mazda and placed it into the 2017 Semi Truck sleeper cabin area. Det. Holden stated that the plastic bin appeared to look very heavy as LUNA was lifting it up into the sleeper cabin. After loading the 2017 Semi Truck, DE LOERA and LUNA got into it, and they drove out of the parking lot. LUNA drove the 2017 Semi Truck and DE LOERA sat in the front passenger seat. Based on training and

experience, Investigators believes that DE LOERA and LUNA were loading narcotics into the 2017 Semi Truck. The following is a photograph of DE LOERA and LUNA as they were accessing the 2017 Semi Truck:



14. Detectives conducted mobile surveillance on LOPEZ as he drove to a shipping company located in Fullerton, CA. The 2019 Semi Truck was pulling a trailer with California license plate 4SU4407. Affiant conducted DMV records check on California license plate 4SU4407 and it revealed it that it was registered to “Ojeda Brothers Trucking / OJEDA Elenes Nefer” with a listed address of xxx N Center Ave Apt 9M Ontario, CA 91764. This was a trailer belonging to OJEDA and his trucking company. After leaving that location, LOPEZ drove back to 14012 S Archibald Ave and parked it. LOPEZ then exited the 2019 Semi Truck and entered his Nissan and drove back to his residence at xxx Mariposa Ave. The following are photographs of LOPEZ accessing the 2019 Semi Truck as well as the trailer it was pulling during the surveillance operation:



15. On May 20, 2022, Investigators wrote and obtained a signed search warrant to deploy GPS tracker device on the 2019 Semi Truck. Investigators installed the tracking device on the 2019 Semi Truck and monitored on daily basis.

16. Investigators monitored the GPS tracker on the 2019 Semi Truck as well as the Nissan associated to LOPEZ. Investigators observed that the 2019 Semi Truck left California and traveled east bound towards the Midwest and East Coast. As soon as the 2019 Semi Truck began

moving, the Nissan stopped and stayed parked at one location. This led Investigators to believe that Carlos Francisco LOPEZ was traveling in the 2019 Semi Truck. The 2019 Semi Truck traveled as far east as Philadelphia. 2019 Semi Truck then turned around and traveled west bound where it arrived in Ohio and eventually parked at 5219 Columbia Rd, Richfield OH, 44286. Investigators conducted an address check and discovered that 5219 Columbia Rd was another long-term semi-truck parking lot/yard. The 2019 Semi Truck stayed parked at this location for approximately 7 days without moving. Investigators contacted a local law enforcement agency in Ohio and requested they go by 5219 Columbia Rd. Ohio law enforcement agency went by 5219 Columbia Rd and observed the 2019 Semi Truck backed into a parking stall at the location with a trailer attached to it. Investigators noticed that this time, the 2019 Semi Truck was pulling a different trailer from when we last observed it in California. This trailer had California license plate 4TZ2267 attached to it. Investigators conducted DMV records check on California license plate 4TZ2267 and it revealed it is registered to "Raccoon Transportation" with a listed address of 1030 N Mountain Ave 336 Ontario, CA 91762. This was another trailer belonging to OJEDA and his trucking company. This trailer with license plate of 4TZ2267 is different from the trailer Investigators observed being pulled by the 2019 Semi Truck in California. That trailer which was being pulled in California was license plate 4SU4407. The following are photographs of the 2019 Semi Truck and California license plate 4TZ2267 which were taken by the Ohio law enforcement personnel in Ohio:



17. Investigators conducted a Western States Information Network (WSIN) check on OJEDA and the 2019 and 2017 Semi Trucks. WSIN is a law enforcement data base which shares investigation information across the United States with state and federal agencies. The WSIN check revealed that OJEDA and his trucking company was being investigated by St. Louis, Missouri DEA for narcotics trafficking. DEA Agent Jason Staats in St. Louis stated that DEA investigators conducted a buy/walk where they purchased 2 kilograms of fentanyl from OJEDA himself.

18. On June 9, 2022, Investigators observed that the GPS tracker indicated the 2019 Semi Truck left truck parking lot/yard located at 20207 Kendall Dr. The 2019 Semi Truck left Southern California and began traveling east bound. As the 2019 Semi Truck entered Arizona, investigators requested a wall stop to be conducted on the vehicle. Once in the state of Arizona, Arizona Department of Public Safety K9 Officer Bubba Wilson conducted the wall stop on the 2019 Semi Truck. After the wall stop was completed, Ofc. Wilson contacted Investigators and

stated that the 2019 Semi Truck was being driven by OJEDA and the front passenger of the vehicle was LUNA. During the traffic stop, Ofc. Wilson's K9 alerted to the cabin of the 2019 Semi Truck. During a subsequent K9 search, Ofc Wilson located approximately an eight (1/8) of an ounce of unknown white crystal-like substance as well as a glass pipe inside the cabin area of the 2019 Semi Truck. Ofc. Wilson stated that based on his training and experience, he recognized this crystal-like substance as methamphetamine and the glass pipe was narcotics paraphernalia that subjects utilize to smoke methamphetamine with. During the contact, LUNA advised Ofc. Wilson that the methamphetamine was his. Ofc. Wilson obtained both OJEDA and LUNA's information for his report and both were sent on their way in the 2019 Semi Truck. The evidence was collected and there will be an arrest warrant for LUNA for possession of methamphetamine. OJEDA provided telephone number 805-xxx-xxxx and LUNA provided telephone number 909- xxx-xxxx to Ofc. Wilson. Ofc. Wilson stated that during the traffic stop, OJEDA was not happy with being stopped and challenged the K9 search of his vehicle. OJEDA stated his truck could not be searched without a search warrant. During routine inspection of the 2019 Semi Truck's paperwork, it was discovered that they had no "log-book" of the company's destination records. Ofc. Wilson stated this was very odd because trucking companies will keep an updated logbook on where they have transported loads/goods too but in this case, OJEDA and or LUNA could not produce any records to Ofc. Wilson. Ofc. Wilson stated that based on his training and experience, he knew that subjects who don't keep a logbook of their activities are most likely conducting illegal activities such as transporting narcotics via semi-trucks. Investigators believe that not keeping a logbook, will assist OJEDA and LUNA in keeping their location(s) undetected from law enforcement who may be investigating them.

19. Investigators conducted a law enforcement telephone data base check of Accurint records on telephone numbers 805- xxx-xxxx and 909- xxx-xxxx. Subscriber name for 805- xxx-xxxx was listed as Nefer OJEDA and telephone number 909- xxx-xxxx subscriber was listed as Ruben LUNA. Investigators also conducted another nationwide search through a law enforcement deconfliction data base called DICE for telephone numbers 805- xxx-xxxx and 909- xxx-xxxx. DICE indicated that both 805- xxx-xxxx and 909- xxx-xxxx were related to no less than three cases across the United States which involved narcotics trafficking. Based on the intel Investigators have obtained, investigators believe telephone numbers 805- xxx-xxxx and 909- xxx-xxxx are being used by OJEDA and LUNA to conduct their narcotics trafficking not only in California but in other States.

20. On June 17, 2022, Investigators authored and obtained a signed search warrant from Honorable Judge Stephen Acquisto of the Superior Court of California of Sacramento Judicial for a PEN/PING on OJEDA, LOPEZ, and LUNA's cell phone call records for 805- xxx-xxxx, 909- xxx-xxxx, and 562- xxx-xxxx. After the search warrant was served, Investigators monitored the PEN/PING's for cell phone numbers 805- xxx-xxxx, 909- xxx-xxxx, and 562- xxx-xxxx on a daily basis.

21. While monitoring the PEN/PING's on all three cell phone numbers, investigators observed that they all were communicating with one another on a daily basis. All three cell phones GPS PING's have shown that they traveled from California to the east coast and stayed there for numerous days at a time on the months of June and July 2022. One of the locations all three cell phones were at was in the state of Ohio. At the time when all three cells phone were in Ohio, Investigators requested that CGNL investigators conduct surveillance on OJEDA, LOPEZ, and LUNA.

22. Between the dates of June 27, 2022, and July 7, 2022, CGNL investigators conducted surveillance on OJEDA, Carlos Francisco LOPEZ, and LUNA. During the surveillance, OJEDA was seen entering and leaving 1024 Galewood Dr Cleveland, OH 44110. NEFER's cell phone (805- xxx-xxxx) PING's placed him (OJEDA) at this residence majority of the days that he stayed in Ohio. This leads Investigators and CGNL to believe that this residence is a location that OJEDA stays at while he is in Ohio.

23. On June 27, 2022, CGNL investigators observed a black GMC SUV, bearing Ohio license plate "JTPxxxx" pull into driveway of 1024 Galewood Dr. An unknown Hispanic female adult walked from the rear of 1024 Galewood Dr and approached the driver's door of SUV. The unknown female took an object (appeared to be a brown bag) from the driver and returns to the rear of the 1024 Galewood Dr. TFO Pinizzotto informed Investigators that based on his training and experience, he believed that the black GMC SUV was dropping money off to the unknown female. OJEDA 's PING's placed him at the residence at this time.

24. On June 29, 2022, CGNL investigators observed a black Honda, bearing Ohio license plate JOF4985, arrive and park directly in front of 1024 Galewood Dr. An unknown black male adult driver (identified as Dante JONES (xx/xx/1976-hereafter JONES), was seen exiting the vehicle with a package in his hand. JONES walked towards the house and approached the front door of 1024 Galewood Dr. JONES was seen handing the package to a subject in the doorway (unable to identify) and then walks back to his vehicle. Based on training and experience, investigators believe JONES dropped off money to the residence. OJEDA's PING's placed him at the residence at this time.

25. During other surveillance operations, CGNL investigators observed OJEDA making physical contact with LUNA and LOPEZ. CGNL investigators have observed OJEDA

going from 1024 Galewood Dr and traveling to Carlos Francisco LOPEZ and LUNA. Through physical surveillance as well as GPS PING's on LOPEZ and LUNA, it appears that LOPEZ and LUNA stay inside the two known Semi-Trucks and OJEDA travels to their locations. This leads investigators to believe that OJEDA is possibly either dropping off money and or picking up narcotics from the two known Semi-Trucks. OJEDA, LOPEZ, and LUNA continue to have telephone communication with one another.

26. On or about June 15, 2022, CGNL investigators learned that LOPEZ had a storage locker leased at Cube Smart Self Storage, located at 6801 Engle Road, Middleburg Heights, Ohio. Investigators responded to the facility and spoke with management. While speaking with management, it was confirmed LOPEZ had an active lease agreement for locker number H0035. The lease agreement was signed by LOPEZ in July 2021. Moreover, management positively identified LOPEZ as the person who signed for the locker. Management further stated the locker was recently extended for a three (3) month period. The payment method used for the three (3) month extension was U.S. currency (cash). While reviewing electronic surveillance footage of the provided by management, the individual who paid for the three (3) month extension appeared to match the physical description of OJEDA-Elenes. After showing a photograph of OJEDA-Elenes to management, they were able to positively identify OJEDA-Elenes as the individual who paid for the locker extension. Furthermore, management identified a vehicle (hereinafter "Subject Vehicle") registered to Juan Carlos FELIXZ (XX/XX/1994), listed at an address on 1024 Galewood Dr, Cleveland, Ohio as the vehicle OJEDA-Elenes was utilizing during his visit to the establishment. This residence was purchased by OJEDA-Elenes in March of 2022.

27. Based on your Affiant's training and experience, I know large-scale drug traffickers will often utilize storage lockers to store narcotics and/or their proceeds derived from their drug

sales. Your Affiant further knows drug traffickers will often pay other individuals to lease the storage lockers in their names. The purpose of this is to make it difficult for law enforcement to be able to prove the drug trafficker has a connection to the locker if narcotics were to be seized. Moreover, your Affiant knows drug traffickers who utilize storage lockers in furtherance of their drug trafficking, will often make monthly cash rental payments.

28. On June 25, 2022, via precise data location from OJEDA-Elenes' cellular telephone device, investigators learned that OJEDA-Elenes left the Los Angeles, California area and began traveling east.

29. On June 27, 2022, via phone pings, OJEDA-Elenes arrived at a truck stop in Richfield, Ohio for approximately one hour, before traveling to 1024 Galewood, Cleveland, Ohio.

30. On June 28, 2022, the Honorable Magistrate Judge Jonathan D. Greenberg (Northern District of Ohio) authorized the installation of a GPS tracking device for the Subject vehicle. The GPS tracking device was installed on July 5, 2022, wherein, investigators began collecting location data of the Subject vehicle.

31. On June 28, 2022, CGNL investigators conducted physical surveillance of the Subject vehicle, and positively identified the Subject vehicle being driven by OJEDA-Elenes. Investigators observed OJEDA depart 1024 Galewood Dr, Cleveland, Ohio and travel directly to a Cube Smart Self Storage located at 10645 Leuer Ave, Cleveland, Ohio. Investigators were unable to follow OJEDA inside the facility, due to the possibility of jeopardizing an on-going investigation. Shortly thereafter, the surveillance operation was terminated. While speaking to management with Cube Smart at a later date, investigators learned that locker #149 located at 10645 Leuer, Cleveland, Ohio, is being leased by Juan FELIXZ, the registered owner of the Subject vehicle.

32. On July 5, 2022, investigators conducted physical surveillance of the Subject vehicle. During the surveillance detail, investigators identified the driver as Robert RENDON and the passenger as OJEDA-Elenes. The Subject vehicle was observed departing 1024 Galewood Dr, Cleveland, Ohio and traveled to LaundroMax laundromat, located at 14930 St. Clair, Cleveland, Ohio. Both OJEDA-Elenes and RENDON exited the Subject vehicle and were observed entering the laundromat empty-handed. After approximately five minutes, both subjects exited the business empty-handed, re-entered the Subject vehicle, then drove to a second laundromat located at 14409 Cedar Road, Cleveland, Ohio. During this time, OJEDA-Elenes was observed exiting the Subject vehicle and entering the laundromat. After approximately five minutes, OJEDA-Elenes exited the laundromat carrying what appeared to be a black leather case/satchel, then re-entered the Subject vehicle (investigators were unable to determine if the case/satchel was in OJEDA-Elenes' possession upon his initial entrance into the business establishment). Investigators then followed OJEDA-Elenes and RENDON back to the LaundroMax located at 14930 St. Clair, Cleveland, Ohio. Based on the short amount of time OJEDA-Elenes was inside the laundromat, and no items were observed being carried by OJEDA-Elenes other than the black case/satchel, your Affiant believes that OJEDA-Elenes possibly met with an unknown individual inside the laundromat.

33. On July 8, 2022, in the overnight hours, precise date location of OJEDA-Elenes' cellular telephone device, showed him returning to the truck stop in Richfield, Ohio. The location data then showed OJEDA-Elenes leaving Ohio and traveling back to California.

34. On July 28, 2022, GPS location data showed the Subject vehicle depart 1024 Galewood, Cleveland, Ohio and drive to the Cube Smart located at 10645 Leuer Avenue, Cleveland, Ohio. The Subject vehicle then traveled directly to 13338 Lorain Ave, Cleveland, Ohio. The Subject vehicle stayed at this location for approximately forty-five minutes before returning

to Cube Smart on Leuer Ave. After leaving the Cube Smart, the Subject vehicle traveled to 2836 Brenner Dr, Lorain, Ohio. The Subject vehicle stayed for approximately ten minutes and then returned to 1024 Galewood.

35. On August 11, 2022, the Honorable Magistrate Judge Jonathan D. Greenberg, U.S. District Court, Northern District of Ohio, authorized the continued use of the GPS tracking device on the Subject vehicle for an additional forty-five (45) days.

36. On Wednesday, September 7, 2022, your Affiant was notified by Central Valley HIDTA detectives that OJEDA was traveling Eastbound on the Ohio Turnpike based on the precise location of OJEDA-Elenes cellular telephone device. CGNL TFO's observed OJEDA-Elenes traveling eastbound on the Ohio Turnpike in a gray California plated tractor with white trailer bearing the name "Racoon Transportation." As OJEDA-Elenes was approximately one hour from the Cleveland Metropolitan area, OJEDA-Elenes' phone was turned off. Physical surveillance was performed, and OJEDA-Elenes was observed traveling to a parking lot located at 17825 St. Clair Avenue, Cleveland, Ohio. Due to the location, CGNL TFO's were unable to observe the tractor trailer after it parked.

37. On Sunday, September 11, 2022, the Subject vehicle traveled to Homewood Suites, located at 4930 Transportation Drive, Sheffield, Ohio and stayed overnight at the hotel.

38. On Monday, September 12, 2022, investigators established physical surveillance at the hotel mentioned in the above paragraph. At approximately 11:00 a.m., investigators observed RENDON exit the hotel carrying two large department store handle bags and a duffel bag, then placed them in the back seat of the Subject vehicle. RENDON re-entered the hotel for approximately five minutes, walked back to the Subject vehicle, departed the parking lot, then traveled eastbound on Interstate 90.

39. After RENDON departed the area, investigators met with hotel management. Hotel management confirmed that RENDON was the renter of room 416. Hotel management stated RENDON rented the room for one (1) night and checked-out prior to investigators arrival. Hotel management granted consent to allow investigators to search the room, prior to cleaning personnel entering the room. During the search of room 416, investigators three, open, vacuum sealed food saver bags and a pair of rubber gloves in the garbage can. Based upon my training and experience, vacuum sealed food saver bags are used to package kilogram amounts of narcotics. Investigators also discovered a small amount of white powder on the table in the kitchen and on the ottoman. The white powder was collected, and all items were seized for evidence. A field test was performed and the white powder that was collected tested positive for cocaine. All of the packaging was sent to the laboratory was further analysis.

40. On Monday, September 19, CGNL TFO's collected curbside trash at RENDON's residence, located at the address of 1024 Galewood, Cleveland, Ohio. The Subject vehicle was parked behind the residence during the operation. Evidence collected from the trash pull included five, open, vacuum sealed food saver bags; one, open, vacuum sealed food saver bag wrapped in black electrical tape, a pair of gardening gloves, a shoebox with white powder on the lid, and a ledger, in which your Affiant believes to contain monetary amounts for recent narcotics transactions. All items were seized. A field test was performed on the white powder on the lid of the shoe box, and it tested positive for cocaine. Based upon my training and experience, the vacuum sealed food saver bags are used to package kilogram amounts of narcotics. All of the packaging were sent to the laboratory for further analysis.

41. On September 23, 2022, Honorable Magistrate Judge Jonathan D. Greenberg, U.S. District Court, Northern District of Ohio, authorized the continued use of the GPS tracking device on the Subject vehicle for an additional forty-five (45) days.

42. On Friday, November 4, 2022, at approximately 2:10PM, while driving the Subject vehicle, RENDON traveled to the CubeSmart Storage Locker located at 10645 Leuer Avenue. RENDON was at CubeSmart for approximately ten minutes.

43. After RENDON departed the area, investigators spoke with CubeSmart management. Management stated that RENDON had paid \$366.48 in cash to extend locker # 149 for a period of three months. Locker #149 is being rented in the name of Juan FELIXZ.

44. RENDON then traveled to the CubeSmart located at 6801 Engle Road, Middleburg Heights. While at the CubeSmart on Engle Road, Investigators were able to observe RENDON drive to locker H0035. Investigators observed RENDON exit the Subject vehicle, open locker #H0035 and re-approach the Subject vehicle. RENDON retrieved a large cardboard box from the Subject vehicle's back seat area and carried it into the locker. Approximately two minutes later, RENDON exited the storage locker carrying a large, black, duffel bag and placed it into the backseat of the Subject vehicle. While RENDON was at Middleburg Heights CubeSmart, he was wearing a bright yellow long sleeve shirt and grey sweatpants with knee pads.

45. After departing the Middleburg Heights CubeSmart, RENDON traveled to Macy's department store, and then traveled to a truck stop / service center located at 17825 St. Clair Ave, Cleveland. This truck stop was previously used when Nefer OJEDA-Elenes came to Cleveland, driving a Raccoon Transportation tractor trailer on or about September 6, 2022. RENDON sat in the driver's seat of the Subject vehicle for several minutes, then exited the vehicle, now wearing the bright yellow shirt and the grey sweatpants with knee pads. RENDON entered the building

for approximately two minutes, and he walked to the sidewalk and appeared to look up and down St. Clair Avenue several times. RENDON departed the truck stop and traveled westbound on St. Clair Avenue. RENDON then turned into the Snow Brite laundromat located at 14930 St. Clair Avenue. RENDON pulled into a parking spot then immediately backed and pulled back onto St. Clair Avenue traveling westbound and traveled to 1024 Galewood Dr, Cleveland, Ohio.

46. In your Affiants training and experience, by RENDON changing his clothes two separate times, I believe RENDON was attempting to conceal his appearance. In addition, your Affiant believes that RENDON was attempting counter surveillance techniques due to him traveling to multiple business establishments not interacting with anyone or exiting his vehicle.

47. After departing 1024 Galewood Dr, Cleveland, Ohio, RENDON traveled to 2057 W. 99th Street, Cleveland, Ohio. RENDON has traveled to this location several times in past after leaving the CubeSmart on Leuer Ave.

48. RENDON then traveled SB on Interstate 77 and arrived at the Pilot Truck stop, located at 5219 Brecksville Road, Richfield, Ohio at 7:59PM. RENDON departed the Pilot truck stop at 8:09PM. Investigators were unable to establish surveillance while at the Pilot Truck stop, however, this truck stop has been used by the OJEDA-Elenes DTO several times in the past.

49. Based on the activity mentioned in the above paragraphs, and training and experience, your Affiant believes RENDON retrieved a backpack from the Middleburg Heights storage locker which contained U.S. currency. Your Affiant believes the U.S. currency was proceeds derived from RENDON's drug sales in the Cleveland, Ohio area. Your Affiant further believes RENDON traveled to the Richfield, Ohio truck stop to relinquish the proceeds to a drug courier who is utilizing a semi-truck to transport the proceeds to the West Coast of the United

States. Your Affiant knows RENDON utilized the Subject vehicle to facilitate the aforementioned drug trafficking activity.

50. On November 9, 2022, Honorable Magistrate Judge Jonathan D. Greenberg, U.S. District Court, Northern District of Ohio, authorized the continued use of the GPS tracking device on the Subject vehicle for an additional forty-five (45) days.

51. On Tuesday, November 23, 2022, the Subject vehicle departed 365 Owego Drive, Painesville, Ohio and arrived at the truck stop / service center located at 17825 St. Clair Ave, Cleveland, Ohio. Several minutes later, the Subject vehicle departed the truck stop. Investigators responded to the truck stop after the Subject vehicle had departed and were able to locate a gray tractor bearing California license plates XPxxxxx, pulling a white trailer. The company name, displayed on the side of the cab was "Raccoon Transportation". This semi has commonly been driven by Nefer ODEJA-Elenes in the past.

52. On Wednesday, November 23, 2022, the Subject vehicle traveled to the Cleveland Hopkins International Airport car rental location. The Subject vehicle departed the rental car location at 11:01 a.m., and traveled to a McDonald's located at 14235 Puritas Ave, Cleveland, Ohio. The Subject vehicle then stayed parked in the McDonald's parking until 11:15 p.m.

53. From information provided by CubeSmart Self Storage management, located at 10645 Leuer Ave, a small silver sedan entered the gate at 1:44 p.m., on November 24, 2022, using the gate code for locker# 149. This locker is leased to Juan FELIXZ. After pulling through the gate, the small silver sedan pulls around the side of the building and enters the indoor area of the facility. From surveillance footage, provided by management, a male, wearing a bright yellow construction shirt, is then seen approaching locker #149, entering the locker and removing, what appeared to be a large box, approximately 36" x 24" x 24", from the locker. The subject then

picked up the box and departed the area. The silver sedan then departs the gate at 1:55 p.m., using the gate code for locker# 149.

54. At 2:49 p.m., on November 24, 2022, the silver sedan returns to the CubeSmart Self Storage, located at 10645 Leuer Ave and enters the gate using locker# 149's gate code. Again, the vehicle pulls around the back and the subject enter the indoor area of the facility. Surveillance footage provided by management showed what appeared to be the same male, wearing the bright yellow construction shirt, walking down the hall with what appeared to be the same large box that was removed at 1:55 p.m. However, based upon how the subject was carrying the box, it appeared to be much heavier. The subject placed the box on the ground in front of locker# 149. The subject then opens the locker and pushes the box into the locker. The male then secures the locker and leaves the area. The silver sedan is then seen leaving the gate at 3:08 p.m.

55. Although the surveillance camera footage from inside the storage locker facility is grainy, investigators believe that Ronald RENDON is the subject that enters storage locker# 149 on both occasions on November 24, 2022. RENDON has been observed wearing a bright yellow, construction style shirt in the past.

56. Based on the activity mentioned in the above paragraphs, and training and experience, investigators believe that the tractor trailer bearing California license plate XP67282 brought a large amount of narcotics from California, to the Cleveland, Ohio area. Investigators believe that on November 24, 2022, the narcotics were transferred from the tractor trailer and placed in Locker# 149 at the CubeSmart Self Storage on Leuer Avenue in Cleveland, Ohio.

57. On November 29, 2022, the Subject vehicle arrived at 2836 Brenner Dr, Lorain, Ohio. This is the residence of Roman HERNANDEZ. HERNANDEZ has served a sixty month sentence for narcotics trafficking in the Southern District of Ohio from an arrest in 2015 in

Columbus, Ohio. After the Subject vehicle departed Brenner Drive, and was driving southbound on Leavitt Rd, investigators were able to observe Ronald RENDON driving the Subject vehicle and Nefer OEJEDA-Elenes sitting in the passenger seat of the Subject vehicle.

58. The Subject vehicle then traveled to the Cleveland Hopkins International Airport rental car location and arrived there at 12:23 p.m. The Subject vehicle immediately departed and traveled to CubeSmart Self Storage, located at 6801 Engle Road, Middleburg Heights. Investigators were able to observe the Subject vehicle enter the gate and only RENDON was in the Target Vehicle. Investigators believes that OJEDA-Elenes was dropped off at the rental car location.

59. CGNL investigators developed sufficient evidence to obtain federal search warrants for 365 Owego Street, Painesville, Ohio, 1024 Galewood Dr, Ohio, 6801 Engle Road, Storage Locker H0035, Middleburg Heights, Ohio and 10645 Leuer Avenue¹, storage locker 149, Cleveland, Ohio¹.

60. On Sunday, January 29, 2023, the search warrant for 365 Owego Street, Painesville, Ohio, was executed by law enforcement. Prior to the execution of the search warrant, investigators observed RENDON and OJEDA exit the residence together, then depart the area in Subject vehicle, wherein a traffic stop was conducted. Investigators conducted a systematic search of the areas included in the warrant. Photographs were taken of the scene along with evidence as it was collected. The evidence collected included, but not limited to: food saver bags, a suspected drug scale, vacuum sealer, three (3) firearms, and a black backpack containing a

¹ As a result of a typographical error the “Leuer” warrant omitted a digit in the warrant, but otherwise sufficiently described the intended search location.

powdery substance. The evidence was collected, bagged and logged. A copy of the inventory was left at the residence.

61. On Sunday, January 29, 2023, the search warrant for 6801 Engle Road, Storage Locker H0035, Middleburg Heights, Ohio, was executed by law enforcement. Investigators conducted a systematic search of the areas included in the warrant. Photographs were taken of the scene along with evidence as it was collected. The evidence collected included, but not limited to packaging material and vacuum sealed rubber-banded stacks of U.S. Currency (unknown amount at this time). The evidence was collected, bagged and logged. A copy of the inventory was left.

62. On Monday, January 30, 2023, the search warrant for 1024 Galewood Dr Cleveland, Ohio, was executed by law enforcement. Investigators conducted a systematic search of the areas included in the warrant. Photographs were taken of the scene along with evidence as it was collected. The evidence collected included, but not limited to a bag containing multiple smaller bags of suspected fentanyl and methamphetamine. The evidence was collected, bagged, and logged. A copy of the inventory was left.

63. On Monday, January 30, 2023, the search warrant for 10645 Leuer Avenue, storage locker 149, Cleveland, Ohio, was executed. During a systematic search of the storage locker, investigators recovered two (2) plastic tote containers containing an estimated total of approximately 30 kilograms of suspected fentanyl and cocaine. Based on training and experience of Affiant, the seized suspected fentanyl and cocaine is consistent in color and appearance with fentanyl and cocaine, previously seized by Affiant in prior unrelated investigations. Based on Affiant's training and experience, the suspected fentanyl and cocaine were wrapped and packaged in a manner consistent with kilograms quantities of controlled

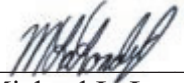
substances, previously seized by Affiant in prior unrelated investigations. Investigators also recovered empty cardboard boxes. The evidence was collected, bagged, and logged. A copy of the inventory was left within the storage locker. The suspected kilogram quantities seized have not been counted officially or lab tested because investigators are awaiting DNA collection from the items.

64. Throughout the investigation, RENDON and/or his vehicle have been observed at 10645 Leuer Avenue, Cleveland, Ohio, approximately twenty (20) times. Each time RENDON has been observed at the facility, gate access codes obtained from management at the facility correspond with access the code utilized for storage locker 149. Moreover, RENDON has been observed placing and removing cardboard boxes from storage locker 149 on numerous occasions. The cardboard boxes recovered within the storage locker during the execution of the search warrant, were similar in size, shape, and appearance with the cardboard boxes RENDON has been observed placing/removing from storage locker 149.

CONCLUSION

65. Based on the foregoing, there is probable cause to believe that on or around about June 16, 2022, and January 30, 2023, in the Northern District of Ohio, Nefer OJEDA-ELENES,

did violate Title 21, United States Code, Sections 846 and 841(a)(1), conspiracy to distribute and possess with the intent to distribute controlled substances (cocaine and fentanyl).



Michael LaLonde
Task Force Officer
Federal Bureau of Investigation

Sworn to via telephone after
submission by reliable electronic
means. Crim.Rules. 4.1; 41(d)(3)



Thomas M. Parker
United States Magistrate Judge
12:24 PM, Jan 31, 2023